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*Board Certified Civil Trial Law
Texas Board of Legal Specialization*

January 13, 2025

VIA EFILE

Honorable Judge Arun Subramanian
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

GRANTED as to the changed dates, but DENIED as to remote appearances instead of in-person appearances. The status conference will now be held on February 7, 2025 at 3:00 PM. This will be an in-person conference, and principal decision-makers must attend. The Clerk of Court is respectfully directed to terminate the motion at Dkt. 42.

SO ORDERED.



Arun Subramanian, U.S.D.J.
Date: January 15, 2025

Re: Case No. 1:24-cv-03713, *Metro Light & Power LLC v. Furnlite Inc.*
Case No. 1:24-cv-09981, *Group Dekko, Inc. and Furnlite Inc. v. Metro Light & Power, LLC*

Dear Judge Subramanian:

I am writing as agreed by both parties to request an extension of the deadlines in the Court's January 6, 2025 Order regarding a video settlement meeting of the parties' decisionmakers and setting a January 24, 2025 case management conference [Dkt. #40]. The reasons for the request are my client's January 10, 2025 surgery and Mr. Davis' conflict with a long-standing commitment in a complex case set for depositions in Florida on January 21 and 24, 2025.

Metro Light & Power LLC's sole member and president is Daniel Deutsch. Mr. Deutsch also designed the Metro product. The company has only 14 employees. Mr. Deutsch is the only person with settlement authority for Metro.

Mr. Deutsch is 64 and has ongoing medical issues, among them orthopedic issues with his knees. Mr. Deutsch was scheduled in December for a knee replacement surgery on January 10. This is his second knee replacement. His first knee replacement resulted in unexpected issues that made his recovery longer and more difficult than expected. Based on his prior surgery, Mr. Deutsch believes he will be on pain medication and otherwise not able to function sufficiently to have an important meeting with the opposing parties in the two above-referenced cases by the current deadline next week. Mr. Deutsch believes he will be sufficiently recovered from his surgery to participate in the video meeting in about two weeks. The parties therefore request that they be permitted to have the video meeting on January 27, 2025, with a report provided to the Court by January 29, 2025. Mr. Deutsch also believes he will not be able to manage the trip to the courtroom until four weeks after his surgery. If Mr. Deutsch is to be present in person in the courtroom, then he asks that the hearing set for January 24, 2025, be reset for February 7, 2025, or the next convenient hearing date after February 7, 2025.

Group Dekko, Inc. ("Dekko") and Furnlite, Inc. ("Furnlite") request that the Court permit its representative to participate in the status conference which the court has set for January 24, 2024 (and which status conference presumably will be reset by the Court) by video. Dekko and Furnlite do not have any employees in New York State, have no facilities in New York State, and Dekko and Furnlite indicate that in person attendance would necessitate travel from Fort Wayne, Indiana, to New York City for the sole purpose of attending the status conference. Travel from Fort Wane is not simple or quick as the only path from the Fort Wayne area is connecting flights to New York area airports. Dekko and Furnlite believe that its business representative could effectively participate by video or phone, if



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video participation is permitted by the Court. Their counsel will be present in person. Metro is not opposed to the Court permitting the business representative of Dekko and Furnlite to participate by video or other electronic means desired by the court.

No party has requested extensions of times or adjournments of these deadlines. Because these are the only live deadlines in this matter, the extension will not affect other deadlines. Metro includes a summary of the original due dates and the requested extensions:

Current Deadline	Proposed New Date	Event
January 17, 2025	January 27, 2025	By this date, the decisionmaker and lead attorney for each party must meet and confer for at least 30 minutes in person or on a video call with the video on.
January 17, 2025	January 29, 2025	Parties must submit a joint letter reflecting the parties' good faith efforts to meet and confer and a joint proposal for the path forward and schedule for both cases that has them trial ready by September 2025.
January 24, 2025 at 3:00 pm.	February 7, 2025, or as the Court's schedule allows	In person/video status conference to discuss potential methods of streamlining these litigations.

The other parties join in this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "D. Healey", enclosed within a faint rectangular border.

Danielle J. Healey

cc: All Parties (via CM/ECF)